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Attorneys for Defendants
 COUNTY OF SANTA CLARA and its
 SANTA CLARA VALLEY MEDICAL
 CENTER, HOLLISTER BREWSTER, M.D.,
 ALFONSO BANUELOS, M.D., DOLLY
 GOEL, M.D., and PETER GREGOR, M.D.

UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 (San Jose)

THRESSA WALKER, GEETA SINGH,)
 M.D., AND KAI IHNKEN, M.D.,)

Plaintiffs,)

v.)

COUNTY OF SANTA CLARA, SANTA)
 CLARA VALLEY MEDICAL CENTER,)
 HOLLISTER BREWSTER, M.D.,)
 ALFONSO BANUELOS, M.D., DOLLY)
 GOEL, M.D., AND DOES 1 through 50,)
 inclusive,)

Defendants.)

No. 10-CV-04668 JF

**STIPULATION AND ORDER ENLARGING
 TIME FOR DEFENDANTS TO RESPOND
 TO PLAINTIFFS' SECOND AMENDED
 COMPLAINT**

The parties, through their respective counsel of record, hereby stipulate and agree to an order enlarging time until May 28, 2011, for Defendants County of Santa Clara and its Santa Clara Valley Medical Center, Alfonso Banuelos, M.D., Dolly Goel, M.D., Hollister Brewster, M.D., and Peter Gregor, M.D., to file and serve a response to the second amended complaint of Plaintiffs Thressa Walker, Geeta Singh, M.D, and Kai Ihnken, M.D. The second amended complaint was served by mail on April 4, 2011 and received by defense counsel on April 8, 2011.

Stipulation and Order Enlarging
 Time for Defendants to Respond to
 Plaintiffs' Second Amended Complaint

1 Good cause exists for this enlargement of time (30 additional days) given the time and
 2 effort that will be necessary to prepare an appropriate responsive pleading. The second
 3 amended complaint involves varied claims by three plaintiffs, comprises 74 pages, and sets
 4 forth 27 causes of action in 310 paragraphs. Specifically, the claims of Plaintiff Thressa Walker
 5 are as follows:

- 6 1. Retaliation under FEHA (California Government Code section 12940 (h))
 7 against all defendants. This code section prohibits discrimination based on an
 8 individual opposing forbidden practices or filing a complaint relating to such
 9 practices.
- 10 2. Retaliation in violation of California Health and Safety Code section 1278.5
 11 against the County. This code section prohibits retaliation against an
 12 individual for complaining to a governmental entity responsible for regulating
 13 and accrediting a health facility.
- 14 3. Retaliation in violation of 42 U.S.C. § 1983 against all defendants. Walker
 15 alleges that defendants violated her First and Fourteenth Amendment rights by
 16 engaging in unlawful retaliation. Walker seeks punitive damages against
 17 Brewster.
- 18 4. Invasion of Privacy against all defendants. Walker seeks punitive damages
 19 against Brewster.
- 20 5. Slander Per Se against all defendants. Walker alleges that the allegations made
 21 against her regarding HIPAA violations and her performance were false and
 22 slanderous. Walker seeks punitive damages against Brewster.
- 23 6. Retaliation in violation of California Labor Code section 1102.5 against the
 24 County and VMC. This code section prohibits retaliation against a person for
 25 disclosing violations of the law to a government agency.
- 26 7. Intentional Infliction of Emotional Distress against all defendants. Walker
 27 seeks punitive damages against Brewster.

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The claims of Plaintiff Geeta Singh, M.D., are as follows:

1. Retaliation under FEHA (Government Code section 12940(h)) against the County and VMC.
2. Retaliation in violation of California Health and Safety Code section 1278.5 against the County and VMC.
3. Retaliation in violation of 42 U.S.C. § 1983 against all defendants. Singh alleges that defendants violated her First and Fourteenth Amendment rights by engaging in unlawful retaliation. Singh seeks punitive damages against Brewster, Banuelos, and Gregor.
4. Retaliation in violation of California Labor Code section 1102.5 against the County and VMC.
5. Violations of the Federal Unequal Pay Act (29 U.S.C. § 206); FEHA (Government Code section 12940(a)); and Labor Code section 1197.5 against the County and VMC.
6. Discrimination/Disparate Treatment in violation of Title VII and FEHA against the County and VMC.
7. Discrimination/Hostile Work Environment in violation of Title VII and FEHA against the County, VMC, and Brewster. Singh seeks punitive damages against Brewster.
8. Invasion of Privacy in violation of the Fourth Amendment and Article 1 of the California Constitution against the County, VMC, Banuelos, Brewster, and Gregor. Singh seeks punitive damages against Brewster, Banuelos, and Gregor.
9. Slander against the County, VMC, Brewster, and Gregor. Singh seeks punitive damages against Brewster and Gregor.
10. Intentional Infliction of Emotional Distress against the County, VMC, Brewster, and Gregor. Singh seeks punitive damages against Brewster and Gregor.

1 Last, the claims of Plaintiff Kai Ihnken, M.D., are as follows:

- 2 1. Retaliation in violation of California Health and Safety Code section 1278.5
- 3 against the County and VMC.
- 4 2. Retaliation in violation of 42 U.S.C. § 1983 against all defendants. Ihnken
- 5 alleges that defendants violated his First and Fourteenth Amendment rights by
- 6 engaging in unlawful retaliation. Ihnken seeks punitive damages against
- 7 Banuelos, Brewster, and Goel.
- 8 3. Fraud under California Civil Code section 1709 against all defendants. Ihnken
- 9 seeks punitive damages against Banuelos, Brewster, and Goel.
- 10 4. Inducing Breach of Contract against Banuelos, Brewster, and Goel. Ihnken
- 11 seeks punitive damages against Banuelos, Brewster, and Goel.
- 12 5. Tortious Intentional Interference with Contractual Relations against Banuelos,
- 13 Brewster, and Goel. Ihnken seeks punitive damages against Banuelos,
- 14 Brewster, and Goel.
- 15 6. Tortious Intentional Interference with Prospective Economic Advantage
- 16 against Banuelos, Brewster, and Goel. Ihnken seeks punitive damages against
- 17 Banuelos, Brewster, and Goel.
- 18 7. Invasion of Privacy in violation of the Fourth Amendment and Article 1 of the
- 19 California Constitution against the County, Banuelos, and Goel. Ihnken seeks
- 20 punitive damages against Banuelos, Brewster, and Goel.
- 21 8. Intentional Infliction of Emotional Distress against Banuelos, Brewster, and
- 22 Goel. Ihnken seeks punitive damages against Banuelos, Brewster, and Goel.
- 23 9. Slander against the County, VMC, Banuelos, Brewster, and Goel. Ihnken
- 24 seeks punitive damages against Banuelos, Brewster, and Goel.

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10. Breach of the Implied Covenant of Good Faith and Fair Dealing against the
County and VMC.

IT IS SO STIPULATED

LAW OFFICES OF
BONNER & BONNER

Dated: April ___, 2011

By:

A. CABRAL BONNER, ESQ.

Attorney for Plaintiffs
THRESSA WALKER, GEETA SINGH,
M.D. and KAI IHNKEN, M.D.

MIGUEL MÁRQUEZ
County Counsel

Dated: April 20, 2011

By:

/S/
GREGORY J. SEBASTINELLI
Deputy County Counsel

Attorneys for Defendants
COUNTY OF SANTA CLARA and its
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CENTER, HOLLISTER BREWSTER,
M.D., ALFONSO BANUELOS, M.D.,
DOLLY GOEL, M.D., and PETER
GREGOR, M.D.

ORDER

IT IS SO ORDERED. Defendants may have to and including May 28, 2011 by which to
file and serve a response to Plaintiffs' second amended complaint.

Dated: 4/29/11


HONORABLE JEREMY D. FOGEL
United States District Court Judge

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10. Breach of the Implied Covenant of Good Faith and Fair Dealing against the
County and VMC.

IT IS SO STIPULATED

LAW OFFICES OF
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Dated: April 20, 2011

By:


A. CABRAL BONNER, ESQ.

Attorney for Plaintiffs
THRESSA WALKER, GEETA SINGH,
M.D. and KAI IHNKEN, M.D.

MIGUEL MÁRQUEZ
County Counsel

Dated: April __, 2011

By:

GREGORY J. SEBASTINELLI
Deputy County Counsel

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ORDER

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